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August 6, 2019

VIA ECF AND EMAIL

Honorable Stuart M. Bernstein
United States Bankruptcy Court
Southern District of New York
One Bowling Green, Room 723
New York, New York 10004-1408
Bernstein.chambers@nysb.uscourts.gov

Re: Irving H. Picard v. Stanley Shapiro, et al., Adv. Pro. No. 10-05383 (SMB): Request for Adjournment

Dear Judge Bernstein:

Plaintiff Irving H. Picard, as trustee for the substantively consolidated SIPA liquidation of Bernard L. Madoff Investment Securities LLC and the chapter 7 estate of Bernard L. Madoff, and defendant Stanley Shapiro and the other defendants named in the above-captioned proceeding respectfully request an adjournment *sine die* of the deadline to submit a final pre-trial order and an adjournment of the final pre-trial conference to September 25, 2019.

In accordance with the Stipulated Order of Mediation Referral and Mediator Selection, which the Court entered on July 10, 2019 (ECF NO. 134), the parties engaged in mediation before the Honorable Faith S. Hochberg, United States District Judge (ret.) on July 23 and 25, 2019. The parties have since reached a settlement in principle to resolve all the Trustee's claims against all defendants.

Under the So-Ordered Amendment to Case Management Plan, which the Court entered on February 7, 2019 (ECF No. 132), the deadline for the parties to submit a final pre-trial order is August 15, 2019, and the final pre-trial conference is set for August 29, 2019. In anticipation of settlement, the parties request an adjournment of the deadline to submit a final pre-trial order *sine die* and an adjournment of the final pre-trial conference to September 25, 2019.

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Respectfully submitted,

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Investment Securities LLC and the consolidated
estate of Bernard L. Madoff*

cc: Barry R. Lax, Esq., Lax & Neville LLP